

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	CRIMINAL NO. 20-10098-WGY-2
STEPHANIE POPP,)	
)	
Defendant.)	
_____)	

ASSENTED-TO MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Stephanie Popp asks the Court to modify her conditions of release to allow the temporary return of her passport and to permit her to travel to Brazil for her sister's wedding, which is on May 21, 2021. If authorized by the Court, Ms. Popp would travel to Brazil on Friday, May 14, 2021 and return to the United States on Sunday, May 23, 2021. She would stay with her parents, Lawrence and Eliana Popp, at 1181 Rua Ascanio de Carvalho, Casa 8, Bebedouro, Sao Paulo 14701-385 and would provide a detailed itinerary to her pretrial services officer. Ms. Popp would return her passport to pretrial services as soon as she returns. In support of this motion, Ms. Popp states:

1. This Court set Ms. Popp's current conditions of release on October 28, 2020. *See Dkt. No. 37*. Among other restrictions, her conditions include surrendering her passport to pretrial services in San Francisco, CA, and restriction of travel to the continental United States.
2. Ms. Popp's sentencing hearing is scheduled for September 28, 2021.
3. Ms. Popp has fully complied with all of her conditions of release.

4. Ms. Popp's supervising Pretrial Services Officer, Keri Foster, confirmed in an e-mail on April 12, 2021 that the Pretrial Services Office supports the modification of Ms. Popp's conditions of release to permit her to attend her sister's wedding in Brazil.

5. The United States Attorney's Office, through AUSA Seth Kosto, assents to this Motion as well.

6. From January to March 2021, Ms. Popp spent a total of 45 hours volunteering at the food pantry at Lutheran Settlement House, a non-profit, community-based organization in Philadelphia.

7. Since December 2020, Ms. Popp has been employed as a therapeutic support staff worker at the Philadelphia office of The MENTOR Network, which provides home and community-based health care to individuals with intellectual and developmental disabilities and youths and families at risk. Ms. Popp spends 30-35 hours per week working with children with autism from low income families to provide support to them.

8. Over the past 18 months, Ms. Popp has demonstrated that she is not a flight risk. She has been aware of the government investigation since October 2019. She therefore notified the U.S. Attorney's Office about a planned trip to visit her family in Brazil in December 2019. Because the government had no objection to her taking this trip, she travelled to Brazil for several weeks and then returned, even though she was aware of the investigation that would lead to this prosecution.

9. With the exception of this one-time change permitting her to travel internationally for a brief period, Ms. Popp is not seeking any other modification of her current conditions of release.

Ms. Popp therefore asks this Court to modify her conditions of release to (1) allow the temporary return of her passport, and (2) allow her to travel to Brazil from May 14, 2021 to May 23, 2021 to attend her sister's wedding.

Respectfully submitted,

STEPHANIE POPP

By her attorneys,

/s/ Rachna Vyas
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Date: April 12, 2021

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Rachna Vyas, Esq., hereby certify that I have conferred in good faith with the Government regarding the above-captioned motion to modify Defendant Stephanie Popp's conditions of release, and the Government, through AUSA Seth Kosto, has assented to the motion.

/s/ Rachna Vyas
Rachna Vyas

CERTIFICATE OF SERVICE

I, Rachna Vyas, Esq., hereby certify that this document, filed through the electronic case filing (ECF) system, will be sent electronically on this day, April 12, 2021, to the registered

participants as identified on the Notice of Electronic Filing (NEF). At this time, I am not aware of any non-registered participants to whom paper copies must be sent.

/s/ Rachna Vyas
Rachna Vyas